

# Exhibit 3

## 1. FT Article

Complaint Range ¶¶ 79-88	Book Range Pg 272-282
<p><b>80:</b> cut ties with “fellow academics” at Cambridge “in a varsity spy scare harking back to the heyday of Soviet espionage at the heart of the British establishment.”</p> <p><b>80-81:</b> “because of concerns over what they fear could be a Kremlin-backed operation to compromise the group.”</p> <p><b>80:</b> “unacceptable Russian influence on the group”.</p>	<p><b>274:</b> cut ties with fellow academics at Cambridge University, in a varsity spy scare harking back to the heyday of Soviet espionage at the heart of the British establishment.”</p> <p><b>276:</b> there “could be a Kremlin-backed operation to compromise the group.”</p> <p><b>275:</b> “unacceptable Russian influence on the group.”</p>

## 2. The Andrew Article

Complaint Range ¶¶ 89-96	Book Range Pg 305-307
<p><b>90:</b> On February 19, 2017, Andrew published an article in the <i>Sunday Times</i> of London, entitled “<b>Impulsive General Misha shoots himself in the foot</b>”.</p>	<p><b>305:</b> On February 19, 2017, Andrew published his article in <i>The Sunday Times</i> of London, titled “<i>Impulsive General Misha shoots himself in the Foot.</i>”</p>
<p><b>91:</b> The Andrew Article did not mention Lokhova by name, but was most certainly of and concerning Lokhova</p>	<p><b>305:</b> The article did not mention me by name but ensured enough details were included to ensure I was easily identifiable.</p>
<p><b>91:</b> laden with sexual innuendo</p>	<p><b>305:</b> laden with sexual innuendo</p>
<p><b>91:</b> Andrew falsely stated that General Flynn asked Lokhova to travel with him as a translator to Moscow on his next official visit and that General Flynn signed an email to Lokhova as “General Misha”.</p>	<p><b>306:</b> Andrew falsely stated General Flynn asked me to travel with him as a translator to Moscow on his next official visit and General Flynn signed an email to me as “General Misha.”</p>
<p><b>92:</b> Halper and Andrew knew these statements were false. Neither Halper nor Andrew ever heard General Flynn ask Lokhova to travel with him to Moscow as a translator or otherwise.</p>	<p><b>306:</b> Halper and Andrew knew the statements in the article were false. Neither of these men ever heard General Flynn ask me to travel with him to Moscow as a translator or otherwise.</p>
<p><b>93:</b> Moreover, Andrew was copied on Lokhova’s email communication with General Flynn. General Flynn never signed a single email, “General Misha”.</p>	<p><b>306:</b> Moreover, Andrew was copied on my email communications with Gen. Flynn. Gen. Flynn never signed a single email, “General Misha.”</p>
<p><b>94:</b> Halper and Andrew created the phraseology “General Misha” because they knew these words would receive international attention by the media and users of social media. The words were sexy and unforgettable. Halper and Andrew knew the words implied and would be immediately understood to mean that there was an intimate relationship between General Flynn and Lokhova. Indeed, the defamatory phrase</p>	<p><b>306:</b> Halper and Andrew emphasized the phraseology “General Misha” (the diminutive of Mikail the equivalent of Mike) because they knew these words would receive international attention from the media and users of social media. The words were sexy and unforgettable. The coconspirators knew the words implied and would be immediately understood to mean there was an intimate relationship between Gen. Flynn and myself.</p>

<p>“General Misha” has been repeated millions of times and lives in infamy on the Internet and in the Twitterverse</p>	<p>Indeed, the defamatory phrase “General Misha” Andrew invented has been repeated millions of times and lives in infamy on the internet.</p>
<p><b>96:</b> Andrew refused to correct the Andrew Article.</p>	<p><b>306:</b> Andrew refused, and still refuses, to correct his article.</p>

### 3. The WSJ Article

Complaint Range ¶¶ 97-112	Book Range Pg 297-304
<p><b>99:</b> the WSJ “journalists” then put it to senior academics at Cambridge that Lokhova and General Flynn had had an affair. The WSJ was informed that the accusations were untrue. In spite of these red flags and reasons to doubt Halper’s veracity, the Journal published Halper’s lies.</p>	<p><b>299:</b> The <i>Wall Street Journal</i> “journalists” put the damaging allegation to senior academics at Cambridge that your author and General Flynn had an affair. The <i>Wall Street Journal</i> was informed all the accusations were untrue and they knew it. With every reason to doubt Halper’s veracity, the <i>Journal</i> still published Halper’s false story.</p>
<p><b>100:</b> Andrew emailed Lokhova as follows: “Dear Svetlana, Neil rang me this morning and has probably briefed you by now about WSJ. Because I refused to speak to them when they rang, I had no idea they were following such an outrageous story. Understandable perhaps if Neil is right about the source, but nonetheless appalling best wishes Chris.”</p>	<p><b>299:</b> Andrew emailed me as follows: Dear Svetlana, Neil [Kent] rang me this morning and has probably briefed you by now about WSJ. Because I refused to speak to them when they rang, I had no idea they were following such an outrageous story. Understandable, perhaps if Neil is right about the source, but nonetheless appalling best wishes Chris.</p>
<p><b>100:</b> Andrew sent Lokhova a second email that stated: “Dear Svetlana, I’ve been contacted by WSJ and refused all comment. David Ignatius of Washington Post is in UK at moment. I’ve known him for years and trust him. I’ve given him your email and he accepts that if you don’t wish to respond, that’s an end to it. I’ve told him you’ve signed a US contract for a blockbuster and that this will later be a big story for him. He trusts my judgement on that! Flynn’s career for years past is obviously going to continue to be investigated. David has an inside track on that which I think he’d share with you if you’re interested.”</p>	<p><b>299-300:</b> It stated: Dear Svetlana, I’ve been contacted by WSJ and refused all comment. David Ignatius of Washington Post is in the UK at moment. I’ve known him for years and trust him. I’ve given him your email, and he accepts that if you don’t wish to respond, that’s an end to it. I’ve told him you’ve signed a US contract for a blockbuster and that this will later be a big story for him. He trusts my judgement on that! Flynn’s career for years past is obviously going to continue to be investigated. David has an inside track on that which I think he’d share with you if you’re interested.</p>
<p><b>101:</b> On March 1, 2017, Lokhova received an email from the WSJ, which stated, “I’m a</p>	<p><b>300:</b> On March 1, 2017, I received an email from the <i>WSJ</i>, which stated “I’m a reporter at</p>

reporter at the Wall Street Journal and am researching a story that will likely mention your relationship with ... Gen. Michael Flynn.”

**102:** North issued a flat denial to the WSJ as follows: “I am writing on behalf of my long-term partner Svetlana Lokhova. Ms Lokhova is currently unwell, and your enquiries have made that condition worse. She is recovering from the recent birth of our daughter. Your baseless allegations have been relaid [sic] to me by two third parties whom you have seen fit to contact. The allegations are deeply upsetting and hurtful to Ms Lokhova and our family. The underlying assumptions behind the allegations are preposterous. Having discussed this matter with Ms Lokhova, I can assure you that they without any foundation. Further, it is likely that your source is acting maliciously in inventing these falsehoods. Re. General Flynn Ms Lokhova has met General Flynn on only one occasion at a dinner in Cambridge in February 2014. The dinner was attended by upwards of a dozen people, and she had a twenty-minute public conversation with General Flynn and others. They have not met or spoke since then ...

**104:** On March 17, 2017, the WSJ published an article, entitled “Mike Flynn Didn’t Report 2014 Interaction With Russian-British National”.

**106:** The gist and defamatory implication of the WSJ Article was that Lokhova engaged in unlawful or suspicious interactions with General Flynn on behalf of the Russia government that should have been reported to the DIA. The WSJ Article is intentionally laden with false facts in order to support Halper’s preconceived false narrative. The

the Wall Street Journal and am researching a story that will likely mention your relationship with ... Gen. Michael Flynn.”

**301:** I had no relationship with Gen. Flynn so, my partner issued a flat denial to the *Wall Street Journal* inquiry as follows: I am writing on behalf of my long-term partner Svetlana Lokhova. Ms. Lokhova is currently unwell, and your inquiries have made that condition worse. She is recovering from the recent birth of our daughter. Your baseless allegations have been relaid [sic] to me by two third parties whom you have seen fit to contact. The allegations are deeply upsetting and hurtful to Ms. Lokhova and our family. The underlying assumptions behind the allegations are preposterous. Having discussed this matter with Ms. Lokhova, I can assure you that they are without any foundation. Further, it is likely that your source is acting maliciously in inventing these falsehoods. Re. General Flynn Ms. Lokhova has met General Flynn on only one occasion at a dinner in Cambridge in February 2014. The dinner was attended by upwards of a dozen people, and she had a twenty-minute public conversation with General Flynn and others. They have not met or spoke since then...

**301:** Despite my hopes to the contrary on March 17, 2017, the *WSJ* published an article written by Carol E. Lee, Rob Barry, Shane Harris, and Christopher S. Stewart, titled “*Mike Flynn Didn’t Report 2014 Interaction with Russian-British National.*”

**301-302:** The gist of the *Wall Street Journal* article was I engaged in unlawful or suspicious interactions with General Flynn on behalf of the Russian government that should have been reported to the Defense Intelligence Agency. The *WSJ* article is intentionally laden with falsehoods in order to support Stefan Halper’s preconceived fake narrative. The article

Article referred to the February 2014 dinner as a “U.K. security conference”. It was not. It was a dinner. The Article misstated that General Flynn’s contact with Lokhova at the Cambridge dinner “came to the notice of US intelligence”. It did not. The Article falsely stated that Lokhova was a “foreign stranger”.

**106:** Moreover, Lokhova’s name, the fact that she was invited to the dinner by Dearlove, and the fact that she would show her research were all pre-reported to the DIA. The Article falsely insinuated and implied that General Flynn and Lokhova had engaged in “anomalous behavior” and that there were inappropriate interactions between the two.

**106:** The WSJ Article falsely stated that Lokhova worked for “Russia’s statecontrolled Sberbank” and suggested that the “contact” between General Flynn and Lokhova at the February 2014 dinner might be the subject of the FBI’s “wide-ranging counterintelligence probe into any contacts that Trump campaign personnel may have had with Russian officials”.

**106:** The WSJ Article further falsely implies that Lokhova had an ulterior motive in attending the dinner and that she “approached Mr. Flynn at the start” (untrue) and “sat next” to him (false) with a view to gathering information from him on behalf of the Russian government. The Article portrays Lokhova and her behavior as so suspicious that it leaves the reader in no doubt that Lokhova was an agent of an “adversarial power”.

**107:** The WSJ Article was republished thousands of times on Twitter. It was instantly and universally understood to imply that

referred to the February 2014 dinner as a “UK security conference.” It was not; it was a work dinner. The article stated that General Flynn’s contact with me at the Cambridge dinner “came to the notice of US intelligence” showing it was a leak of highly classified information from a live Criminal investigation. This has not been investigated. Halper fabricated his allegations in August 2016 years after the dinner he did not attend. The article falsely stated I was a “foreign stranger,”

**302:** Moreover, my name, the fact I was invited to the dinner by the spymaster Dearlove, and I would show my research were all prereported to the Defense Intelligence Agency. The article falsely insinuated and implied General Flynn and I engaged in “anomalous behavior” and there were inappropriate interactions between us.

**302:** The *WSJ* article also falsely stated I had worked for “Russia’s state-controlled Sberbank” and had been leaked that the “contact” between General Flynn and me at the February 2014 dinner might be the subject of the FBI’s “wide-ranging counterintelligence probe into any contacts Trump campaign personnel may have had with Russian officials.”

**302-303:** The *Wall Street Journal* article further falsely implies I had an ulterior motive in attending the dinner and I “approached Mr. Flynn at the start” (untrue) and “sat next” to him (false) with a view to gathering information from him on behalf of the Russian government. The article portrays me and my behavior as so suspicious it leaves the reader with no doubt I was an agent of an “adversarial power”:

**303:** The *WSJ* article was republished thousands of times on Twitter. It was instantly and universally understood to imply that

<p>General Flynn and Lokhova had engaged in wrongdoing</p> <p><b>108:</b> On March 17, 2017, Bill Palmer (“Palmer”), author of the left-wing “Palmer Report”, republished the Journal’s false statements in an online article, entitled “Exposed: Michael Flynn has been secretly meeting with Russians since his time at the DIA”.</p> <p><b>109:</b> “Flynn met with a young Russian woman named Svetlana Lokhova while at a conference in the United Kingdom in 2014. If this Russian woman came out of nowhere and approached Flynn, then he would have been expected and required to report the encounter when he got home. These are the kinds of tactics often used by foreign spies, and are therefore reported and tracked – particularly when it involves the head of the DIA. But instead there is no record that Flynn reported the meeting, thus suggesting that the meeting involved something on Flynn’s part that he didn’t want the U.S. government knowing about. This raises several questions. Was this Russian woman (source: <b>Wall Street Journal</b>) sent to this UK conference to recruit Michael Flynn for the Kremlin?”</p> <p><b>110:</b> On March 19, 2017, Kent emailed the WSJ to correct the grave errors of the WSJ Article. Kent stated as follows:</p> <p><b>111.</b> In spite of repeated requests to retract and/or correct the WSJ Article, from both Lokhova and Kent, the Journal refused (and refuses) to take any action to mitigate the damage caused to Lokhova.</p>	<p>General Flynn and I had engaged in wrongdoing.</p> <p><b>303:</b> On March 17, 2017, Bill Palmer, author of the <i>Palmer Report</i>, republished the <i>Journal</i>’s false statements in an online article titled “Exposed: Michael Flynn has been secretly meeting with Russians since his time at the DIA.”</p> <p><b>303:</b> Flynn met with a young Russian woman named Svetlana Lokhova while at a conference in the United Kingdom in 2014. If this Russian woman came out of nowhere and approached Flynn, then he would have been expected and required to report the encounter when he got home. These are the kinds of tactics often used by foreign spies and are therefore reported and tracked—particularly when it involves the head of the DIA. But instead, there is no record that Flynn reported the meeting, thus suggesting that the meeting involved something on Flynn’s part that he didn’t want the US government knowing about. This raises several questions. Was this Russian woman (source: <i>Wall Street Journal</i>) sent to this UK conference to recruit Michael Flynn for the Kremlin?</p> <p><b>303:</b> On March 19, 2017 Professor Kent emailed the <i>WSJ</i> to correct the grave errors of their article falsely attributed to him. Kent stated as follows:</p> <p><b>304:</b> In spite of repeated requests to retract or correct the <i>WSJ</i> article, they refused (and still refuse) to take any action to mitigate the damage caused to me.</p>
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## 4. The Guardian Article

Complaint Range ¶¶ 113-118	Book Range Pg 311-320
<p><b>113:</b> On March 22, 2017, Likhova received the following email from reporter Nick Hopkins with the Guardian: “We are researching a story about General Michael Flynn and the circumstances that led to his appointment as President Trump’s NSA last November, and the concerns this appeared to generate within the American intelligence community. As you know, the Wall Street Journal published a story a few days ago which named you as someone who had contact with General Flynn in 2014. At the time, General Flynn was head of the DIA. An extremely sensitive post. The WSJ reported that General Flynn did not report your meeting to the Defence Department, which the WSJ suggested was unusual, as you were – and remain – an expert on Russian intelligence, and he was, primarily, America’s ‘top spy’ . . . Our story intends to reflect the meeting in Cambridge which, we understand, was being discussed by American and British intelligence officials in the period just before General Flynn’s appointment. We understand this was one of a number of episodes US officials were assessing to determine what they suggested, if anything, about General Flynn’s suitability for such a security sensitive position. General Flynn’s spokesman has told us that the meeting with you in 2014 was ‘incidental’ and nothing more....Hopkins’ email went on to say that: “ I wanted to give you an opportunity to give an on the record comment about the story in the WSJ, and also to address the nature and longevity of your connection with General Flynn, which appears to have raised questions, perhaps entirely</p>	<p><b>313-315:</b> On March 22, 2017, I received the following email from <i>Guardian</i> reporter Nick Hopkins: We are researching a story about General Michael Flynn and the circumstances that led to his appointment as President Trump’s NSA last November, and the concerns this appeared to generate within the American intelligence community. As you know, the Wall Street Journal published a story a few days ago which named you as someone who had contact with General Flynn in 2014. At the time, General Flynn was head of the DIA. An extremely sensitive post. The WSJ reported that General Flynn did not report your meeting to the Defense Department, which the WSJ suggested was unusual, as you were—and remain—an expert on Russian intelligence, and he was, primarily, America’s “top spy” . . . Our story intends to reflect the meeting in Cambridge, which, we understand, was being discussed by American and British intelligence officials in the period just before General Flynn’s appointment. We understand this was one of a number of episodes US officials were assessing to determine what they suggested, if anything, about General Flynn’s suitability for such a security-sensitive position. General Flynn’s spokesman has told us that the meeting with you in 2014 was “incidental” and nothing more. His email went on to say: I wanted to give you an opportunity to give an on the record comment about the story in the WSJ, and also to address the nature and longevity of your connection with General Flynn, which appears to have raised questions, perhaps entirely unfairly, about his suitability for the NSA post. Earlier the same day, without telling me Hopkins emailed Professor</p>

unfairly, about his suitability for the NSA post.” Earlier in the day, Hopkins emailed Andrew as follows: “We have been told, by multiple sources, both here and in the US, that American intelligence officials were fretting about General Flynn ahead of his appointment as NSA. These concerns were based on his alleged behaviours in the previous two years, which included his trips to Russia. Their fears, whether they were justified or not, also included an assessment of his connection to a woman named by the WSJ as Svetlana Lokhova . . . We have other material that suggests the meeting in Cambridge was the start, not the end, of their correspondence. Your own piece in the Sunday Times suggested a connection which endured beyond the seminar, and to the casual reader (as I was at the time), a naive behaviour rather unbecoming and of the head of the DIA. You have told Luke – quite forcefully I understand – that we would be quite wrong to suggest that anything untoward happened in Cambridge. Nor will we. But we do intend to set out the broad fears of US intelligence officials and explain why they were as concerned as they seemed to be, even if these anxieties might have been misplaced.”

**116:** The Guardian further falsely reported that “US and British intelligence officers discussed Flynn’s ‘worrisome’ behaviour”; that “[m]ultiple sources, who spoke on the condition of anonymity, said the CIA and FBI were discussing this episode, along with many others, as they assessed Flynn’s suitability to serve as national security adviser”; and that the Cambridge dinner meeting “was part of a wider pattern of ‘maverick’ behaviour which included repeated contacts with Russia”.

**117:** The Guardian Article went viral. It was shared via Twitter by virtually every major news network hundreds of thousands of time on April 1, 2017. Between 2017 and the present day, it was republished over and over

Christopher Andrew as follows: We have been told, by multiple sources, both here and in the US, that American intelligence officials were fretting about General Flynn ahead of his appointment as NSA. These concerns were based on his alleged behaviours in the previous two years, which included his trips to Russia. Their fears, whether they were justified or not, also included an assessment of his connection to a woman named by the WSJ as Svetlana Lokhova . . . We have other material that suggests the meeting in Cambridge was the start, not the end, of their correspondence. Your own piece in the Sunday Times suggested a connection which endured beyond the seminar, and to the casual reader (as I was at the time), a naive behavior rather unbecoming and of the head of the DIA. You have told Luke—quite forcefully, I understand—that we would be quite wrong to suggest that anything untoward happened in Cambridge. Nor will we. But we do intend to set out the broad fears of US intelligence officials and explain why they were as concerned as they seemed to be, even if these anxieties might have been misplaced.

**318:** *The Guardian* further falsely reported that “US and British intelligence officers discussed Flynn’s “worrisome” behavior”; that “multiple sources, who spoke on the condition of anonymity, said the CIA and FBI were discussing this episode, along with many others, as they assessed Flynn’s suitability to serve as national security adviser” and that “the Cambridge meeting was part of a wider pattern of “maverick” behavior which included repeated contacts with Russia.”

**318-319:** *The Guardian* article went viral as was the plan. It was shared via Twitter by virtually every major news network on April 1, 2017. Up to the present day, it has been republished hundreds of thousands more times.

<p>hundreds of thousands more times. The <i>Guardian</i> Article was universally understood to imply that Lokhova was an agent of Russian intelligence and that she and General Flynn had engaged behavior that caused “US intelligence officials” “serious concerns”</p>	<p>The <i>Guardian</i> article was universally understood to imply I was an agent of Russian intelligence and I and General Flynn engaged in behavior that caused “US intelligence officials” “serious concerns.”</p>
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## 5. The Daily Mail and the Daily Telegraph Articles

Complaint Range ¶¶ 119-123	Book Range Pg 319-320
<p><b>120:</b> On March 31, 2017 and April 2, 2017, the Daily Mail and the Daily Telegraph published back-to-back stories about Likhova and General Flynn. (“Disgraced Trump aide, and questions over his meeting with Cambridge historian at Intelligence Seminar raised concerns among British and US security chiefs”); (“Cambridge University dragged into row over Donald Trump’s ex-spy chief’s links to Russia”) (the “Mail and Telegraph Articles”)].</p>	<p><b>319:</b> On March 31, 2017, and April 2, 2017, several British newspapers such as the <i>Daily Mail</i> and <i>The Telegraph</i> followed up the <i>Guardian</i> article and published explosive back-to-back stories about General Flynn and myself. “Disgraced Trump aide and questions over his meeting with Cambridge historian at Intelligence Seminar raised concerns among British and US security chiefs” and “Cambridge University dragged into row over Donald Trump’s ex-spy chief’s links to Russia.”</p>
<p><b>122:</b> The Mail and Telegraph Articles repeated and republished the false and defamatory statements made in the WSJ Article and the <i>Guardian</i> Article. The Mail Article was liked 15.9 Million times on Facebook.</p>	<p><b>319:</b> The articles repeated and republished the false and defamatory statements made in the <i>WSJ</i> article and <i>The Guardian</i> article to a much wider audience. The <i>Mail</i> article, for instance, was liked 15.9 million times on Facebook.</p>

## 6. The NYT Article

Complaint Range ¶¶ 128-135 & 148	Book Range Pg 30, 321-322, 330-332
<p><b>128:</b> On March 4, 2017, Times reporter, Mathew Rosenberg (“Rosenberg”), emailed Lokhova as follows: “Hi – I cover intelligence and national security for The New York Times. I’m eager to speak with you about Lt. Gen. Flynn, who I am told you met at Cambridge in 2014.”</p>	<p><b>321:</b> on March 4, 2017, <i>New York Times</i> reporter Matthew Rosenberg emailed me as follows: “Hi—I cover intelligence and national security for The New York Times. I’m eager to speak with you about Lt. Gen. Flynn, who I am told you met at Cambridge in 2014.”</p>
<p><b>129:</b> Rosenberg acknowledged that he had been given the wrong information about Lokhova and that he had “found out” it was not Lokhova who had arranged General Flynn’s trip to Moscow in December 2015</p>	<p><b>321:</b> Rosenberg later told me he was given the wrong information about me. He told me he soon “found out” it was not I who arranged the payment for General Flynn’s trip to the Russia Today Gala dinner in Moscow in December 2015.</p>
<p><b>130:</b> On May 12, 2017, the BBC published a detailed interview with Lokhova in which Lokhova explained the truth about what happened at the Cambridge dinner in February 2014 and her limited and infrequent interactions with General Flynn.</p>	<p><b>322:</b> On May 12, 2017, the BBC published a detailed interview with me. I explained the truth for the first time about what happened at the Cambridge dinner in February 2014 and my limited and infrequent email interactions with General Flynn.</p>
<p><b>131:</b> Lokhova forwarded the BBC story to Rosenberg at the New York Times. Rosenberg said that he believed Lokhova’s story and was going to publish an interview to clear her name.</p>	<p><b>322:</b> I forwarded the BBC story to Matthew Rosenberg at <i>The New York Times</i>. Rosenberg said he believed my story and was going to publish an interview to clear my name.</p>
<p><b>132:</b> In addition to the BBC story, Lokhova gave Rosenberg an extensive interview and provided detailed written answers to questions posed by Rosenberg. Among the detailed written statements given Rosenberg are the following</p>	<p><b>322:</b> In addition to sending him the BBC story, I gave Matt Rosenberg an extensive interview and provided detailed written answers to questions he posed.</p>
<p><b>134:</b> The reason Rosenberg and the NYT shelved the story was they knew the FBI</p>	<p><b>322:</b> The reason Rosenberg and the <i>NYT</i> shelved the story was they knew about the plan</p>

<p>planned to start a formal investigation into “Russian collusion”. The truth would have been inconvenient for the FBI.</p> <p><b>135:</b> The FBI counterintelligence operation, of which Halper and the <i>NYT</i> were important parts, succeeded in creating the false impression of “collusion” between members of the Trump campaign and Russians. This false narrative established a basis for investigating the invented “collusion”.</p> <p><b>148:</b> <a href="https://www.nytimes.com/2018/05/18/us/politics/trump-fbi-informant-russianinvestigation.html">https://www.nytimes.com/2018/05/18/us/politics/trump-fbi-informant-russianinvestigation.html</a></p>	<p>to start a formal Special Counsel investigation into “Russian collusion.” The truth would have been inconvenient for the FBI.</p> <p><b>322:</b> The FBI counterintelligence operation, of which Halper and the <i>NYT</i> were important parts, succeeded in creating and sustaining the false impression of “collusion” between members of the Trump campaign and Russians. This false narrative established a basis for investigating the invented “collusion.”</p> <p><b>30 &amp; 330 &amp; 332:</b> <a href="https://www.nytimes.com/2018/05/18/us/politics/trump-fbi-informant-russianinvestigation.html">https://www.nytimes.com/2018/05/18/us/politics/trump-fbi-informant-russianinvestigation.html</a></p>
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## 7. The Post Article

Complaint Range ¶¶ 156-163	Book Range Pg 332-336
<p><b>156:</b> On June 5, 2018, the Post published a story written by Tom Hamburger (“Hamburger”), Robert Costa (“Costa”) and Ellen Nakashima (“Nakashima”), entitled “Cambridge University perch gave FBI source access to top intelligence figures — and a cover as he reached out to Trump associates”.</p>	<p><b>332:</b> On June 5, 2018, the <i>Washington Post</i> published a story written by Tom Hamburger, Halper’s former student Robert Costa, and Ellen Nakashima, titled “Cambridge University perch gave FBI source access to top intelligence figures—and a cover as he reached out to Trump associates.”</p>
<p><b>157:</b> The source of the Post Article was Halper.</p>	<p><b>322:</b> The sources of the <i>Washington Post</i> article were of course Halper, Costa, and Richard Dearlove.</p>
<p><b>158:</b> Prior to publication, the Post reached out to Lokhova.</p>	<p><b>333:</b> Prior to publication, the <i>Washington Post</i> reached out to me by email.</p>
<p><b>159:</b> Prior to publication, Hamburger talked to Ignatius. Hamburger knew, therefore, that the facts stated in the Post Article were false and unverifiable.</p>	<p><b>333:</b> Prior to publication, Hamburger talked to Ignatius, so he knew from many sources his story was false.</p>
<p><b>160:</b> Prior to publication, Hamburger sent Lokhova a copy of her May 27, 2018 interview with the <i>Times</i> of London. Lokhova verified that her statements to the <i>Times</i> were accurate.</p>	<p><b>334:</b> Prior to publication, Hamburger sent me a copy of my May 27, 2018 interview in which I roast Halper with <i>The Sunday Times</i> of London (see below). I verified to the <i>Washington Post</i> reporter that my statements to the <i>Times</i> were accurate and the truth. They suppressed those from their article.</p>
<p><b>161:</b> The Post Article named Halper, and described him as a “a longtime source of information for U.S. intelligence and law enforcement personnel”.</p>	<p><b>334-335:</b> The Post article Hamburger wrote named Halper and described him as a “a longtime source of information for US intelligence and law enforcement personnel.”</p>



## 8. MSNBC

Complaint Range ¶¶ 164-172	Book Range Pg 337-339
<p><b>167:</b> In May 2018, after Halper was exposed as an FBI spy, NBCUniversal contacted Lokhova. NBCUniversal's producer, Anna Schecter ("Schecter"), represented that NBCUniversal wanted to do a program on Halper.</p> <p><b>167:</b> Schecter represented that the program would help clear Lokhova's name, and would hold "a powerful (if repugnant) man to account" and would hold America's "top law enforcement agency to account". "We will set the record straight, and right a wrong. It will be all the more powerful if NBC does it ... because it's the most watched network". Schecter stated that she was "passionate about righting this wrong and telling your story, which exposes Halper's true character, and calls out the FBI for relying on a slanderer who cares much more about telling a juicy yarn than the truth. This is a breach of justice full stop".</p> <p><b>167:</b> Schecter further stated that "[a]s a woman, and a professional woman, I shudder at the notion of a fallacious story about sleeping with Flynn and spying no less not just told around Cambridge but given to the press and reported as fact. I and my team in the investigative unit will take this story and its important implications very seriously and I believe our agencies (FBI and CIA) will be better for the fact that we shine a bright light on an unreliable and loose-lipped informant prone to inventing stories".</p> <p><b>168:</b> NBCUniversal concealed its ulterior motive from Lokhova. NBCUniversal was not interested in publishing the truth or holding</p>	<p><b>337:</b> In late May 2018, after Halper was exposed as an FBI spy, they contacted me by email. A producer, Anna Schecter, represented to me the network wanted to do a program exposing Halper.</p> <p><b>337-338:</b> Schecter claimed the program would help clear my name and would hold "a powerful (if repugnant) man to account" and would also hold America's "top law enforcement agency to account." Schecter proclaimed, "we will set the record straight, and right a wrong. It will be all the more powerful if NBC does it . . . because it's the most watched network." Schecter stated she was "passionate about righting this wrong and telling your story, which exposes Halper's true Ibid. character, and calls out the FBI for relying on a slanderer who cares much more about telling a juicy yarn than the truth. This is a breach of justice full stop."</p> <p><b>338:</b> Schecter further stated in the email. "[a]s a woman, and a professional woman, I shudder at the notion of a fallacious story about sleeping with Flynn and spying no less not just told around Cambridge but given to the press and reported as fact. I and my team in the investigative unit will take this story and its important implications very seriously and I believe our agencies (FBI and CIA) will be better for the fact that we shine a bright light on an unreliable and looselipped informant prone to inventing stories."</p> <p><b>338-339:</b> NBC was concealing its ulterior motive from me. They were not interested in publishing the truth or holding Halper</p>

anyone accountable. Rather, NBCUniversal was determined to defame and discredit General Flynn and Lokhova, and to blindly promote the “Russian collusion” narrative. The phone calls from Schechter after May 2018 went from fact-checking to interrogation-type questions to twisting. Then, Lokhova noticed that she was being followed on Twitter by Ken Dilanian (Dilanian”) and the producer of the Rachel Maddow Show, Mathew Alexander.

**168:** Schechter called and concealed the fact that others were on the line. During one call, it struck Lokhova that there were more than just her and Schechter on the line. Lokhova asked Schechter directly if Dilanian was listening to the call and feeding her questions? Schechter abruptly ended the call. Schechter then called Lokhova from her mobile. Schechter sounded distressed, and said she was being pressured by her colleagues. Schechter said she believed Lokhova, but said a colleague at NBCUniversal with “25 years intelligence experience” was laughing and saying that “everyone at the CIA knows Flynn had an affair with Lokhova”.

accountable. Rather, NBC was determined to defame and discredit General Flynn and me, and to blindly promote the “Russian collusion” narrative. The phone calls from Schechter after May 2018 went from fact-checking to interrogation-type questions to twisting. Then, I noticed I had some odd new followers on Twitter including Ken Dilanian (who is known to have a “closely collaborative relationship with the CIA”) and Matthew Alexander the producer of the *Rachel Maddow Show*.

**339:** Schechter called me and concealed there were others on the line. It struck me, from the tone of the questioning that there were more than just me and Schechter in the conversation. I asked her directly if Ken Dilanian was listening to the call and feeding her questions. Schechter abruptly ended the call. She then called me back from her mobile phone a few minutes later. Schechter sounded distressed and said she was being pressured by her colleagues. She said she believed me but said a colleague at NBC with “twenty-five years veteran of intelligence” was laughing and saying, “everyone at the CIA knows Flynn had an affair with Lokhova.”